

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

JANE DOES 1-6, et al.,)
)
Plaintiffs,)
)
)
v.) 1:21-cv-00242-JDL
)
)
JANET T. MILLS, in her official)
capacity as Governor of the)
State of Maine, et al.,)
)
Defendants.)

AGREED-UPON PROTECTIVE ORDER

With the agreement of the parties, the Court enters the following Protective Order as indicated in the Court's Order on Plaintiffs' Motion to Proceed Under Pseudonyms and for Protective Order, ECF No. 32.

Plaintiffs are allowed to proceed in pseudonym, and the docket shall continue to reflect Plaintiffs' names as captioned in the Verified Complaint, ECF No. 1. Plaintiffs will be referred to by their pseudonyms in all public pleadings and other public documents filed in this litigation, and Plaintiffs shall be allowed to endorse documents filed in this litigation using their pseudonyms.

By 1:00 p.m. EST on September 3, 2021, Plaintiffs' counsel shall disclose in writing the names and business addresses of all Plaintiffs to this action, including which pseudonym applies to which Plaintiff (the "Identifying Information"), to counsel of record for Defendants Janet T. Mills, Jeanne M. Lambrew, and Dr. Nirav D. Shah (collectively, "State Defendants").

Until further order of the Court, State Defendants' counsel of record may disclose the Identifying Information to only the following: attorneys and staff employed by the Office of the Attorney General; the individual State Defendants; State Defendants' in-house counsel and their attorneys and staff; and State employees who have knowledge of the facts alleged in Plaintiffs' Complaint and who State Defendants' counsel of record determine are reasonably necessary to respond to Plaintiffs' Motion for Preliminary Injunction, ECF No. 3 ("PI Motion"). Each person, other than State Defendants' counsel of record, to whom any Identifying Information is to be disclosed pursuant to this Order shall be provided a copy of this Order¹ and shall agree in advance that he or she will not disclose any Identifying Information to any person not entitled to know the information under this Order, and that he or she will not use any Identifying Information except in connection with State Defendants' response to Plaintiffs' PI Motion.

State Defendants, by and through their counsel of record, may use the Identifying Information in State Defendants' response to Plaintiffs' PI Motion. If State Defendants' filings in response to Plaintiffs' PI Motion contains any Identifying Information, they shall file those documents under seal, in keeping with the Court's Local Rules.

If necessary, the Court will revisit the issue of disclosing the Identifying Information to the other Defendants and its use in the balance of this litigation after ruling on Plaintiffs' PI Motion.

¹ Provision of the Order by e-mail will be sufficient.

SO ORDERED.

Dated: September 2, 2021

/s/ JON D. LEVY
CHIEF U.S. DISTRICT JUDGE